

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

REBECCA TERRY,

Plaintiff,

v.

COUNTY OF MILWAUKEE, DAVID A.
CLARKE, JR., in his personal and official
capacities, OFFICER BRIAN WENZEL,
JANE AND JOHN DOE, UNKNOWN
EMPLOYEES OF MILWAUKEE COUNTY
JAIL, JANE AND JOHN DOE,
UNKNOWN JAIL SUPERVISORS,
ARMOR CORRECTIONAL HEALTH
SERVICES, CAROLYN EXUM, MORGAN
BEVENUE, MARGARET HOOVER, JANE
AND JOHN DOE, UNKNOWN
EMPLOYEES OF ARMOR
CORRECTIONAL HEALTH SERVICES,
JANE AND JOHN DOE UNKNOWN
ARMOR HEALTHCARE SUPERVISORS,

Case No.: 17-cv-1112-JPS

Defendants.

**SUPPLEMENTAL DECLARATION OF DOUGLAS S. KNOTT IN SUPPORT OF
MEMORANDUM IN OPPOSITION TO CIVIL L.R. 7(h) EXPEDITED
NON-DISPOSITIVE MOTION FOR EVIDENTIARY SANCTIONS**

STATE OF WISCONSIN)
) ss:
MILWAUKEE COUNTY)

I, Douglas S. Knott, declare as follows pursuant to 28 U.S.C. § 1746:

1. That I am one of the attorneys of record for Defendants Milwaukee County, David Clarke, Brian Wenzel, Carolyn Exum, and Margaret Hoover (the “County Defendants”).

2. I make this Declaration upon personal knowledge and in support of County Defendants' Memorandum in Opposition to Civil L.R. 7(h) Expedited Non-Dispositive Motion for Evidentiary Sanctions.

3. Attached hereto as Exhibit 1 is a true and correct copy of correspondence dated April 20, 2018, outlining the County Defendants' efforts to produce documents responsive to Plaintiff's First Set of Requests for Production of Documents.

Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Dated this 20th day of April, 2018.

By: /s/ Douglas S. Knott
Douglas S. Knott